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May 30, 2025

Via ECF

The Honorable Denise L. Cote
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Granted. The deadline to respond to the counterclaims is June 18, 2025. The conference is adjourned to June 27, 2025 at 2:00 p.m.



June 2, 2025

Re: *ITC Infotech (USA), Inc., v. Team Industrial Services, Inc.*
Index No. 1:25-cv-02634-DLC

Dear Judge Cote:

In accordance with Your Honor's Individual Practices, we write on behalf of plaintiff ITC Infotech (USA), Inc. ("ITCI") with regard to the following: (a) our request to extend the deadline for ITCI's answer to the counterclaims filed by defendant Team Industrial Services, Inc. ("Team"); (b) a request by Team's counsel to move the date of the Rule 16(b) conference; and (c) ITCI's disclosure in support of subject matter jurisdiction under 28 U.S.C. § 1332.

Requested Extension for Answer to Counterclaims

Pursuant to the Court's Individual Practice 1D, ITCI requests that the deadline for its answer to Team's counterclaims be extended by one week to June 18. The original deadline is June 11, and ITCI has not previously sought an extension. Team has consented to ITCI's extension request.

Requested New Date for Rule 16(b) Conference

Team's counsel has informed us that he has a conflict on June 26, the day when the Rule 16(b) conference is scheduled. The parties accordingly inquire as to whether the Court would be able to reschedule the conference for June 27, or any other day during the week of June 23.

Diversity Jurisdiction Disclosure

In accordance with the Court's Individual Practice 5B, ITCI provides the factual basis for the case's subject matter jurisdiction based on diversity of citizenship pursuant to 28 U.S.C. § 1332. ITCI is corporation organized under the laws of New Jersey with a principal place of

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business in Paramus, New Jersey, and Team is a corporation organized under the laws of Texas with a principal place of business in Sugar Land, Texas. ITCI seeks damages in excess of \$2 million, which exceeds the \$75,000 amount specified in 28 U.S.C § 1332.

We thank the Court for your consideration of these items.

Respectfully submitted,

/s/ Brian A. Burns

Brian A. Burns

cc: All counsel of record (via ECF)